



Leaders in Public Safety Communications™

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October 24, 2012

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: PS Dockets 11-153 and 10-255, Text-to-9-1-1

Dear Ms. Dortch:

This is to inform the Commission that on October 23, 2012, the undersigned spoke with David Furth, Deputy Bureau Chief of the Public Safety & Homeland Security Bureau via telephone regarding the above-referenced proceedings that concern, among other matters, text-to-9-1-1 requirements.

APCO International has often stated that texting can provide an important alternative means to reach 9-1-1 in those emergency situations where a voice call is not feasible. We have also been encouraged by recent successful trials of text-to-9-1-1 capability utilizing existing texting technology. Therefore, during the conversation with Mr. Furth, the undersigned stated APCO International's view that the Commission should adopt an order as soon as possible that includes a basic requirement that wireless carriers deliver 9-1-1 text messages to Public Safety Answering Points (PSAPs) that are ready and willing to accept such messages. The order should also require that there be a "bounce back" message informing the sender to make a 9-1-1 voice call when a text cannot be delivered to a PSAP. APCO International understands that compliance deadlines and other implementation rules related to the order will need to be considered in a further notice of proposed rulemaking. However, deferring action on the basic requirement would only lead to uncertainty and delay serious consideration of implementation issues and requirements.

Please contact the undersigned should the Commission have any questions.

Respectfully submitted,

/s/

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cc: David Furth